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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

**IN RE GOOGLE PLUS PROFILE
LITIGATION**

) No. 5:18-CV-06164-EJD (VKD)

**PLAINTIFFS' NOTICE OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

) Date: February 20, 2020

) Time: 9:00 a.m.

Courtroom: 4, 5th Floor

Judge: Hon. Edward J. Davila

**PLAINTIFFS' NOTICE OF MOTION FOR
PRELIMINARY APPROVAL - CASE NO: 5:18-CV-06164-EJD**

NOTICE OF MOTION

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on February 20, 2020, at 9:00AM, or as soon thereafter as counsel may be heard, before the Honorable Edward J. Davila, Courtroom 4, 5th Floor, United States District Court for the Northern District of California, 280 South 1st Street, San Jose, California 95113, Plaintiffs will and hereby move this Court, pursuant to Federal Rule of Civil Procedure 23, to grant Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

Plaintiffs base their Motion for Preliminary Approval of Class Action Settlement on: Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authority in Support Thereof; Settlement Agreement and all exhibits attached thereto; Proposed Press Release; Proposed Order Granting the Motion; Declaration of John A. Yanchunis; Declaration of Steven Weisbrot; and all other records and papers on file in this action and all other matters properly before the Court.

STATEMENT OF RELIEF SOUGHT

Plaintiffs seek an order pursuant to Federal Rule of Civil Procedure 23(b)(3) certifying the Settlement Class more fully described in the Settlement Agreement, attached hereto as Exhibit 1; preliminarily approving the Settlement as fair, reasonable, and adequate; directing notice to be disseminated to the Settlement Class in the form and manner proposed by the parties as set forth in the Settlement Agreement and attached exhibits A and B thereto; appointing Angeion Group to serve as the Settlement Administrator; appointing Plaintiffs as Class Representatives and the undersigned attorneys as Class Counsel; and setting a hearing date and schedule for final approval of the Settlement and consideration of Class Counsel's forthcoming motion for award of fees, costs, expenses, and service awards.

DATED: January 6, 2020

/s/ *John A. Yanchunis*

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